



Automotive Safety Council

Prevent

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Notify

Administrative Office:

737 Malabu Drive
Lexington, KY 40502-3338
Tel: 859 269.4240
Fax: 859 269.4241

Email: info@automotivesafetycouncil.org

July 29, 2011

Amer Zain,
Electronics Engineer
Office of Engineering and Technology
445 12th Street, SW – Room 7-A110
Washington, DC 20554

Re: FCC-2011-0262-0001 47 CFR Part 15
ET Docket No. 11-90 RM-11555

Amendment of Sections 15.35 and 15.253 of the
Commission's Rules Regarding Operation of Radar Systems
in the 76-77 GHz Band.

ET Docket No. 10-28

Amendment of Section 15.253 of the Commission's Rules to
Permit Fixed Use of Radar in the 76-77 GHz Band.

Notice of Proposed Rule Making

The Automotive Safety Council (ASC) is non-profit organization whose purpose is to substantially reduce traffic accidents, injuries and fatalities. ASC was founded in 1961 as the American Seat Belt Council to promote improved automotive safety through the use of seat belts and later, when airbags were mandated in 1987, became the Automotive Occupant Restraints Council. In 2011, the organization changed its name again to Automotive Safety Council to reflect the implementation of active safety products using electronics to prevent auto accidents. ASC has been in the forefront of auto safety as an advocate for frontal airbags; other passive safety technologies such as side and rollover protection, inflatable knee bolsters, advanced energy-absorbing steering wheels, weight sensing for out-of-position injury prevention; child and small occupant injury reduction; inflatable seat belts and various seat belt load-limiting; energy-management systems; and active safety products including Electronic Stability Control, Advanced Cruise Control, Emergency Brake Assist, Lane Departure Warning, Lane Keeping, Night Vision, Road Curvature Following Advanced Head Light Control and Improved Rear back Up Warning. ASC is comprised of most of the world's leading auto safety component and system suppliers.

ASC is committed to providing the latest safety technology information so the related regulations, legislation and consumer rating tests can be developed in a confident and expedient manner.

In regards to the proposed rulemaking dealing with Rules Regarding Operation of Radar Systems in the 76-77 GHz Band, ASC agrees with the Commission's proposal of changing the limits as petitioned by Toyota Motor Company to allow a uniform standard of radar emissions that are in harmony with the balance of the world and allows for a safe application of vehicle based 76-77 GHz, in order to save thousands of lives in the prevention of automotive accidents. ASC member companies are the world's leading designers and manufacturers of vehicle-based radar systems and have proven the tremendous potential that this type of technology can bring to the public safety. We concur with the FCC that the limits can be changed based upon the latest studies showing exposure at the proposed limits will be and are non-injurious to humans. The proposed rulemaking will allow the auto industry to move forward with confidence in providing the latest lifesaving technologies to the motoring public. The National Highway Traffic Safety Administration (NHTSA) on their NCAP star rating program has listed technologies that use this type technology as being recommended for the public. Only through this type of proposed rule will that technology be able to move forward in a way to make it affordable for the general public.

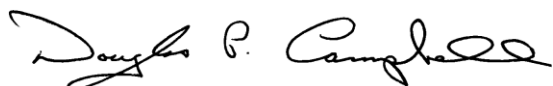
As far as the concerns raised from the NRAO about the potential interference on their devices due to sharing this frequency, ASC does not agree with the creation of areas where the vehicle based systems would need to be turned off or prohibited, as the likelihood of a horizontal emitting beam from a vehicle going directly down the receiver of a vertical placed antenna is difficult to imagine; as well as the fact that these type of applications are generally in remote or mountainous areas.

As far as the proposal to allow fixed ground-based systems to use this technology, we feel there is the potential for interference to the vehicle-based systems and, therefore, should be restricted to non-roadside applications to prevent interaction with the lifesaving vehicle based systems. Roadside illumination as proposed by Era would be acceptable as an application.

We therefore agree with the FCC with the above exclusions on the NPRM as written and look forward to its final ruling which can advance the saving of thousands of lives in the United States.

Respectfully submitted,

Douglas P. Campbell

A handwritten signature in black ink, appearing to read "Douglas P. Campbell". The signature is fluid and cursive, with the first name "Douglas" and last name "Campbell" being clearly legible.

President
Automotive Safety Council